

**UNITED STATES DISTRICT COURT  
DISTRICT OF MASSACHUSETTS**

UNITED STATES OF AMERICA )  
 )  
 V. )  
 )  
 EDUARDO PAGAN )

CRIMINAL NO. 05-30046MAP

**MOTION TO RECONSIDER DETENTION STATUS**

Now comes the defendant in the above-titled matter and moves that this Honorable Court reconsider his detention status.

In support of this Motion the undersigned states:

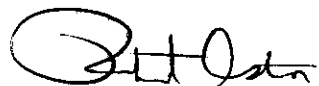
1. Defendant has no history of violence, and is not a threat to the community;
2. Defendant has roots in the community, has always appeared for court prior to detention, and poses no risk of flight;
3. Prior to detention, defendant was gainfully employed; and
4. A list of proposed conditions is attached hereto.

Wherefore, defendant moves that this Honorable Court reconsider his detention status and release him pending trial.

Defendant respectfully requests a hearing on this motion.

**CERTIFICATE OF SERVICE**

I hereby certify that a true copy of the above document was served upon the attorney of record for each party by mail (by hand) on 9/29/05



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**PROPOSED CONDITIONS OF RELEASE**

1. Defendant is required to immediately seek employment and to be gainfully employed within two weeks of today's court hearing;
2. Defendant is required to live with his brother Roberto Pagan, who resides at 322 Maple Street in Springfield;
3. Defendant is subject to a curfew from 8:30 p.m. to 6:30 a.m., during which time he is required to be available by telephone located at the address stated in paragraph (2);
4. Defendant is prohibited from having any contact, direct or indirect, with any individual identified as a member of the Latin King organization;
5. Defendant is prohibited from consuming any drugs or alcohol; and
6. Defendant is prohibited from leaving the Commonwealth of Massachusetts.



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